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September 25, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Defining Primary Lines, CC Docket No. 97-181

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4) copies of MCI Telecommunications Comments regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,

Don Sussman

Enclosure
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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Defining Primary Lines

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CC Docket No. 97-181

COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

Bradley Stillman
Don Sussman
Alan Buzacott
MCI Telecommunications Corporation
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September 25, 1997

Table of Contents

Summary	i
I. Introduction	1
II. Identification of Primary Residential Lines	2
A. Defining Primary Residential Lines	2
B. Customer Self-Certification	4
C. Resellers	5
D. Privacy Issues	6
III. Verifying Primary Residential Line Information	9
A. Auditing	9
B. Models	11
IV. Enforcement in an Open and Verifiable System of Identifying Primary Lines ..	13
V. Consumer Disclosure	17
VI. Conclusion	18

Summary

In the Notice, the Commission requests comments on criteria that must be established to identify primary residential lines for the purpose of determining SLC and PICC levels. The Commission must adopt criteria that (1) consumers will clearly understand; (2) access customers can audit; (3) regulators can monitor and enforce; (4) do not inflate the size of the universal service fund; and (5) do not confer upon the incumbent local exchange carrier ("ILEC") a competitive advantage vis a vis new entrants, nor unnecessarily place the ILEC between a new entrant and its existing or potential customers.

Included in its Comments, MCI urges the Commission to:

- adopt a definition of primary residential line that corresponds to a customer's account (e.g., bill);
- require ILECs to use customer self-certification to identify primary residential lines. The customer should identify no more than one line per service provider as primary;
- prevent ILECs from using information collected for the purpose of determining the correct SLC or PICC for any other purpose. Such information should not be used by ILECs for marketing purposes; and,
- establish an open and verifiable system of identifying primary residential lines that is enforceable. ILECs must be required to provide IXCs that are billed PICCs sufficient insight into the information upon which their monthly bills are based, so that the IXCs can audit each bill before it is paid.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Defining Primary Lines) **CC Docket No. 97-181**

COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

I. Introduction

MCI Telecommunications Corporation respectfully submits these comments in response to the Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding, released September 4, 1997. In the Universal Service Order¹ and the Access Charge Reform Order², the Commission concluded that the \$3.50 cap on the subscriber line charge (SLC) for primary residential and single-line businesses should remain unchanged. In the Access Charge Reform Order, the Commission adjusted the SLC caps for additional residential and business lines, and created a presubscribed interexchange carrier charge ("PICC") that will supplant the traffic-sensitive carrier common line charge

¹ Federal State Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 97-157 (rel. May 8, 1997) ("Universal Service Order"); see also Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Recommended Decision, 12 FCC Rcd 87, 132 (1996) ("Universal service Recommended Decision").

² Access Charge Reform, Price Cap Performance Review for Local Exchange Carriers, Transport Rate Structure and Pricing, End User Common Line Charges, CC Docket Nos. 96-262, 94-1, 91-213, and 95-72, First Report and Order, FCC 97-158 (rel. May 16, 1997) ("Access Charge Reform Order").

over time. In 1998, the SLC and the PICC levels for primary residential and single-line business lines will be lower than the levels presubscribed for secondary residential and multi-line business lines.

In the Notice, the Commission requests comments on criteria that must be established to identify primary residential lines for the purpose of determining SLC and PICC levels. The Commission must adopt criteria that (1) consumers will clearly understand; (2) access customers can audit; (3) regulators can monitor and enforce; (4) do not inflate the size of the universal service fund; and (5) do not confer upon the incumbent local exchange carrier ("ILEC") a competitive advantage vis a vis new entrants, nor unnecessarily place the ILEC between a new entrant and its existing or potential customers.

II. Identification of Primary Residential Lines

A. Defining Primary Residential Lines

In the Notice, the Commission seeks comment on how it should define "primary residential line."³ MCI urges the Commission to adopt a definition that is easily understandable to the consumer, competitively neutral, verifiable, and which does not significantly increase the industry's universal service obligation.

MCI suggests that the Commission adopt a definition of primary residential line which corresponds to a customer's account (e.g., bill). Such a definition would be easily understandable to the customer, and would allow for instances where different customers

³ Notice at ¶6.

live in the same location. Moreover, this definition, coupled with information provided by ILEC Billing Name & Address (BNA) Records, would permit ILECs and IXC's to identify multi-line customers and would not be unduly burdensome because it would rely primarily on existing ILEC customer databases.⁴

In the Notice, the Commission tentatively concludes that ILECs should be permitted to use customer self-certification to identify primary lines for access charge purposes. MCI agrees that customer self-certification is the only practical approach to identifying primary residential lines, and believes that ILECs should not only be permitted, but required, to use customer self-certification to identify primary residential lines. MCI agrees with the Commission that such a method is not administratively burdensome and is more conducive to promoting competition than allowing the ILEC to determine which line is primary.⁵ In the event that a multiline customer does not identify one of its lines as primary, the primary line should be randomly designated.

⁴ Alternatively, the ILECs' Billing Account Number (BAN) records could be used to identify multiline customers.

⁵ For example, as the Commission points out in its Notice, ILECs might attempt to market secondary lines to end users as primary lines, on which a lower SLC would be assessed, and make up the difference in other rates.

B. Customer Self-Certification

1. ILEC Customer Self-Certification

In the Notice, the Commission seeks comment on the language that would have to be posed to subscribers to determine which is their primary residential line under such a self-certification proposal. In instances where the end user has only one line, and it is provided by the ILEC, the line can automatically be labeled as the "primary" line -- no customer self-certification is needed. In instances where the end user has more than one line provided by the ILEC, the ILEC should provide the following written notice to its customer:

In order for your local telephone company to correctly bill you and your presubscribed long distance company, federal rules require you to certify only one line as the primary line which serves your residence/household. If you do not select a primary line, one line will be randomly designated as your primary line.

Please check which line you would like designated as primary, and return to your local telephone company:

___ (XXX)XXX-XXXX
___ (XXX)XXX-XXXX

2. Resale Customer Self-Certification

In instances where a customer receives multiline service from a CLEC reseller, and not from the ILEC, the CLEC would administer the customer self-certification process. The CLEC would relay information identifying the primary line to the ILEC in order to permit correct assessment of the SLCs and PICCs.

If a customer receives service from both an ILEC and a CLEC reseller each service provider would administer the customer self-certification process for the lines it provides. The customer should identify no more than one line per service provider as primary.⁶ This approach is competitively neutral because it allows all carriers to compete on an equal footing to provide the primary line. It also avoids the need for CLECs and ILECs to exchange information and coordinate the self-certification process, as would be the case if a customer with two or more carriers was required to designate which carrier offered service over the primary line. Moreover, this approach is consistent with the account-based definition of primary lines outlined above.

C. *Resellers*

The Commission seeks comment in its Notice on whether it should require resellers to identify the primary and secondary lines of their customers and relay that information to price cap ILECs, or, whether price cap ILECs should identify the primary and secondary lines for resellers' customers directly.⁷ The Commission also seeks comment on whether a reseller should pass along original copies of its customers' certifications to the price cap ILEC from which it is purchasing wholesale service.⁸

ILECs should not be placed between a reseller and its customer. Given the possibilities of anticompetitive behavior by the ILEC, ILECs should not be placed in the

⁶ This also would apply in instances where two or more facilities-based carriers provide local service to the customer.

⁷ Notice at ¶11.

⁸ Id.

position of identifying the primary and secondary lines for resellers' customers directly.

Instead, resellers should be required to identify primary and secondary lines of their customers and relay that information to price cap ILECs. CLECs that provide local service through resale of ILEC facilities should not be required to provide original copies of its customers' certifications to the price cap ILECs unless a billing dispute occurs, and it is specifically requested to do so by the ILEC. CLECs should be required to maintain such information, for a reasonable amount of time (similar to PC changes). This will reduce the administrative burden of both ILECs and CLECs, while maintaining a system of accountability.

D. Privacy Issues

MCI supports the Commission's tentative conclusion that information collected by the ILEC for the purpose of determining the correct SLC or PICC may not be disclosed or used for any other purpose.⁹ Such information is required for the limited purpose of ensuring that IXCs and end users are correctly billed, and to assist in measuring universal service obligations. Such information should not be utilized for other reasons (e.g., ILEC marketing efforts).

The Commission also requests comment on whether primary line information is customer proprietary network information (CPNI). Such information would appear to "relate[] to the ... type ... of a telecommunications service subscribed to by any customer" and indirectly "relates to the quantity ... and amount of use of a telecommunications

⁹ Notice at ¶16.

service subscribed to by any customer” under the first clause in the definition of CPNI in subsection (A) of Section 222(f)(1) of the Act.

It is not so clear, however, that such data would be “made available to the carrier by the customer solely by virtue of the carrier-customer relationship,” under the second clause of subsection (A). An ILEC could not learn or derive such data from its provision of service, but would have to be informed of it by the customer. On the other hand, since it is the ILEC providing local service to the customer that would have to be informed of this data by the customer, such information might be considered data that is made available “solely by virtue of the carrier-customer relationship.” Until the Commission has had an opportunity to interpret the “solely by virtue of” phrase in the CPNI rulemaking proceeding,¹⁰ it will not be possible to make a conclusive determination as to whether primary line information is covered by Section 222(f)(1)(A).

It seems more clear that such data would be covered by subsection (B) of Section 222(f)(1), since presumably, it will appear on subscribers’ telephone bills and is “information ... pertaining to telephone exchange service....” Any definitive answer to this aspect of the definition of CPNI, however, will also have to wait for Commission interpretation.

Whether or not primary line information constitutes CPNI, the Commission’s proposal would not contravene the restrictions on CPNI use or disclosure in Section 222. Section 222(c)(1) provides that

¹⁰ Telecommunications Carriers’ Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115.

Except as required by law or with the approval of the customer, a telecommunications carrier that receives or obtains [CPNI] by virtue of its provision of a telecommunications service shall only use, disclose, or permit access to individually identifiable [CPNI] in its provision of (A) the telecommunications service from which such information is derived, or (B) services necessary to, or used in, the provision of such telecommunications service....

The “use” or “disclos[ure]” of CPNI proposed by the Commission would seem to be permissible for a number of reasons under Section 222(c)(1). First, if the Commission requires such disclosure, it will be “required by law” and thus permissible. Second, the language of Section 222(c)(1) presents an issue similar to that raised by the definition in Section 222(f)(1)(A), in that it is not clear that such data would be “receive[d] or obtain[ed] ... by virtue of [the ILEC’s] provision of a telecommunications service.” The ILEC would not be deriving this information through its provision of service; rather, it would have to ask the subscriber. The use or disclosure of such data might not violate Section 222(c)(1) for that reason as well. Third, it could be argued that the disclosure of CPNI proposed by the Commission would occur in the ILEC’s “provision of ... the telecommunications service from which such information is derived,” since it would be necessary for the proper billing of the subscriber’s local service and would not be used in connection with any other service category.

Finally, even if Section 222(c) otherwise might prohibit the disclosure of primary line information as proposed by the Commission, such disclosure would be permitted under the exceptions in Section 222(d), which allow a carrier to use or disclose CPNI, in subsection (1), “to ... bill ... for telecommunications services” and, in (2), “to protect the

rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services....”

Primary line information will be used by the ILEC to bill end users the correct SLC, under the Commission’s proposal, thus meeting the exception in Section 222(d)(1). Such information must also be disclosed to the Commission so that the Commission can verify the number of primary lines reported by each ILEC and thereby ensure that¹¹ thus meeting the exception in Section 222(d)(2). Accordingly, the exceptions in Section 222(d) permit the use and disclosure of primary line information proposed by the Commission, whether or not such information otherwise constitutes CPNI and is restricted by Section 222(c)(1).

III. Verifying Primary Residential Line Information

A. Auditing

As ILECs become both suppliers and competitors to IXC’s in their home regions, the ability to audit bills become increasingly important. MCI supports the Commission’s tentative conclusion to implement a method to verify the number of primary lines served by a carrier, identified through customer self-certification.¹² MCI agrees with the Commission that such a method is indeed necessary given the potential incentives for carriers to misreport the number of primary lines. However, rather than relying solely on periodic Commission audits or ILEC self-auditing, the Commission should require ILECs

¹¹ Notice at ¶17.

¹² Notice at ¶17.

to provide IXCs that are billed PICCs sufficient insight into the information upon which their monthly bills are based, so that the IXCs can audit each bill before it is paid.

At a minimum, the Commission should make clear that LEC bills for PICCs should include the following:

- Aggregate line counts by class of customers;
- Line level detail for each billed telephone number, including all other telephone numbers associated with the billed telephone number;
- Identification of the class of customer for each line (if a company does not have all lines of a multiline customer PIC'd to it, it must also have the primary billed telephone line information);
- The date the line was PIC'd to each IXC;
- The date the PIC changed (if applicable);
- Trunk level detail with the same information as listed above for lines;
- Level of SLC assessed on a per line basis (for comparison to the PICC for that line); and,
- PICC charges billed separately from switched and special access charges using the CABs process.

MCI has serious concerns about its ability to audit and bill its customers for the primary interexchange carrier charges. The time necessary for development of these functions and the costs associated with it are significant and the January 1, 1998 deadline for implementation will be extremely difficult to achieve. The Commission must help facilitate this process by clarifying the information regarding the PICC immediately.

B. Models

The Commission seeks comment on whether the methodology used in the Hatfield Model, version 4.0, could provide a method of verifying the number of primary residential lines served by price cap LECs.¹³ As noted by the Commission, the PNR methodology used in developing data inputs to the Hatfield Model uses information derived from 1990 census data and other sources to estimate the number of households in each Census Block as of 1995.¹⁴ The number of households is adjusted for households that do not have a telephone, based on 1990 census information. Finally, the total number of residential lines in each census block is adjusted to reflect penetration of second lines, based on information obtained from commercial data providers.¹⁵

MCI believes that the methodology developed by PNR Associates can provide a useful source of information in verifying or auditing the number of primary lines served by each LEC. However, the information should be used with some caution. It should be noted that version 4.0 of the Hatfield Model uniquely assigns each Census Block Group

¹³ Notice at ¶19.

¹⁴ A Census Block is a unit of geography developed by the Bureau of the Census to facilitate the decennial census. It typically consists of 10-20 households.

¹⁵ A detailed description of the access line model used as an input to the Hatfield Model is contained in Appendix A to the "Model Description" document submitted. See Letter from Richard N. Clarke, AT&T, to William F. Caton, Acting Secretary, Federal Communications Commission, Ex Parte Presentation, CC Docket Nos. 96-45 and 97-160, filed August 5, 1997.

("CBG") in the nation to a local exchange carrier.¹⁶ For those CBGs that are served by more than one LEC (as, for instance, where a CBG "straddles" the boundary between two or more LECs' service territory), the CBG is assigned to the LEC serving the largest number of lines in the CBG. For this reason, some households that are, in actuality, served by one LEC may, in the access line model, be assigned to a LEC serving an adjacent territory.

MCI and AT&T currently are engaged in revisions to the access line model and to the method by which households and businesses are associated with LEC wire centers. In a pending release of the Hatfield Model, census territories will not be used as a basis for assigning households to LEC wire centers. Rather, a combination of LEC wire center service area boundary maps and information on the identity of telephone numbers by customer locations will be used to ensure that only lines actually served by each wire center are assigned to each wire center. With this release, any inaccuracies resulting from the use of the relatively "coarse-grained" CBG as the unit of analysis will have been eliminated. MCI would recommend that the Commission use this information, rather than the information contained in earlier releases of the Hatfield Model, if it intends to use model data to verify or audit primary residential line counts by LEC.

The Commission also seeks comment on whether the information contained in the Hatfield Model would require modification to account for second homes. The access line

¹⁶ A Census Block Group is comprised of several Census Blocks, and typically consists of approximately 400 households, although individual Census Block Groups may contain many more or many less households.

model used in the Hatfield Model contains both a count of total residential lines, which is based on census and other data sources, and reconciled to total reported residential access lines for each LEC, and a count of households adjusted for households without telephones. The total residential line count is used in engineering telephone plant, in order to ensure that all locations with telephone service are served by the telephone network. The count of households represents only those dwelling units that are actually occupied and which have telephone service. As such, this count is, within the limits of accuracy of the census counts, equivalent to the number of primary lines in each LEC's service territory. This number would require no adjustment for second homes or vacation homes, as these locations would not be counted as "occupied" in the census count.

IV. Enforcement in an Open and Verifiable System of Identifying Primary Lines

The Commission seeks comment on the mechanisms available to it to enforce its access charge rules. As an initial matter, MCI stresses that the system used by the carriers (ILECs) to identify the number of primary lines in a given area must be open, verifiable, and auditable to protect against fraud or misrepresentation by the ILECs. This is critical because, by virtue of their bottleneck facilities, only the ILECs control the information that establishes the number of primary lines and the resulting assessment of the PICC on the IXC's.

Specifically, the Commission seeks comment as to whether its authority under sections 4(I),¹⁷ 206-209,¹⁸ 312,¹⁹ 403,²⁰ and 503²¹ of the Communications Act of 1934, and the provisions of Title 18 of the United States Code²² are sufficient to deter fraud or misrepresentations by carriers (ILECs) or consumers that may arise under the customer self-certification approach for identification of primary lines. All of these sections of the Communications Act and section 1001(a) of 18 U.S.C. are mechanisms the Commission may rely on to enforce its access charge rules, and specifically, the self-certification approach. It is important to note that sections 206-209 are important enforcement provisions with respect to common carriers, but are not applicable to consumers. Further, MCI believes the Commission should emphasize the punitive nature of the forfeiture provisions of section 503 and the damages provisions of section 209. These two sections are particularly helpful in the event an ILEC misrepresents the number of primary lines

¹⁷ 47 U.S.C. § 154(4)(I) (Commission's general authority).

¹⁸ 47 U.S.C. §§206-209 (complaints and damages provisions against common carriers).

¹⁹ 47 U.S.C. §312 (Commission authority to order a person to cease and desist from violating the Act or Commission rule).

²⁰ 47 U.S.C. §403 (Commission authority to institute inquiries on its own motion).

²¹ 47 U.S.C. §503 (imposing forfeiture penalties for violations of the Act).

²² 18 U.S.C. §1001(a) (imposing a penalty of fine or imprisonment penalties for one who, *inter alia*, "knowingly and willfully" misrepresents a material fact or who makes a materially false, fictitious statement or representation regarding any matter within the jurisdiction of the executive branch of the United States government).

and any resulting incorrect PICC assessment on the IXC. The punitive nature of FCC action under these sections would serve as a deterrent for such misrepresentations.

MCI believes that the FCC has further authority for its use of additional enforcement mechanisms. First, MCI recommends that the ILECs be required to file quarterly, certified reports which, at a minimum, provide the number of primary and secondary lines in a given region or study area. In the alternative, the reports should contain information which will enable all parties to determine the nature of each line. In this way, it would be possible for the data from the ILECs to be readily audited. If a dispute arises, the same information that is included in the ILEC's quarterly report could also be sent to an independent third party administrator to assess whether the calculation is accurate, at the expense of the party at fault.

Moreover, the Commission also seeks comment on the types of sanctions that would be appropriate and consistent with the Commission's statutory authority to punish violations of the rules regarding the identification of primary lines and whether section 222(c)(1) or any other portion of section 222 provides adequate authority to prevent misuse of the information that ILECs collect. MCI agrees that any misuse of this collected information is very serious concern and that section 222(c)(1) should trigger the Commission's enforcement authority where there is a misuse of customer proprietary network information ("CPNI").

MCI agrees that if the Commission, through an audit or other method to verify primary line counts, discovers that a price cap ILEC misreported the number of primary

lines it serves, the Commission should: (1) order the price cap ILEC to correct its billing practices and assess SLCs and PICCs at the correct level with interest and other fees expended for its collection; and (2) impose forfeitures pursuant to 47 U.S.C. §§220(d) or 503(b) for violations of the Commission's rules. These sanctions are necessary to ensure accuracy in the calculation of primary lines and assessment of SLCs and PICCs, without allowing the ILECs to realize any monetary benefit from a misrepresentation or inaccurate method of primary line identification. MCI concurs with the Commission's final requirement that if an ILEC misreports the number of primary lines it serves, that ILEC should have an independent auditor conduct audits of its records at regular intervals determined by the Commission at the ILEC's expense. MCI believes this is a critical safeguard upon discovery that an ILEC has failed to satisfy the Commission's access charge rules.

Additionally, MCI recommends that the Commission mandate that an ILEC may not disconnect a customer from an IXC while a controversy is pending regarding the number of primary lines and any PICC assessment based on that disputed count. This is essential for keeping the primary lines identification system running smoothly and for allowing proper and accurate resolution of disputes. This safeguard also protects against a disconnection based on an intentional or unintentional miscalculation.

V. Consumer Disclosure

MCI agrees with the Commission's tentative conclusion that the distinction between primary and residential lines may cause customer confusion.²³ To minimize such confusion, the Commission should require price cap ILECs to provide consumers with a uniform disclosure statement describing this distinction. MCI proposes that price cap ILECs that charge a SLC should be required to make the following statement:

The subscriber line charge is a fee collected by your local telephone company to defray part of the cost of providing telephone service. The Federal Communications Commission allows your local telephone company to charge no more than \$3.50 for the subscriber line charge for each primary residential line. For additional lines, the Federal Communications Commission allows local telephone companies to charge no more than \$5.00 per line for the subscriber line charge in 1998.

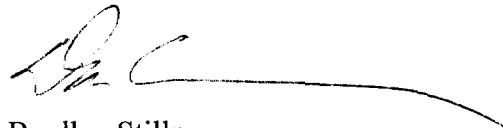
Price cap ILECs should be required to provide this statement orally at the time when a subscriber orders telephone service, in writing with a customer's first bill, then in writing yearly thereafter. The written notification will also indicate the annual increases in the SLC. The Commission should require that the SLC notification be printed separately from all ILEC marketing and consumer information campaigns to prevent anticompetitive ILEC behavior, and to ensure that such information is presented concisely and in an understandable manner to the consumer.

²³ Notice at ¶22.

VI. Conclusion

WHEREFORE, MCI Telecommunications Corporation respectfully requests that the Commission adopt the positions raised above.

Respectfully submitted,

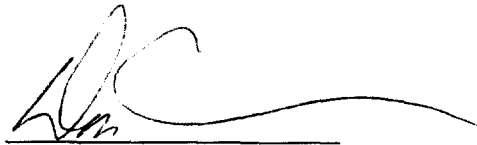
A handwritten signature in black ink, appearing to read 'Bradley Stillman', with a long horizontal flourish extending to the right.

Bradley Stillman
Don Sussman
Alan Buzacott
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20006

September 25, 1997

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on September 25, 1997.

A handwritten signature in black ink, appearing to read 'Don Sussman', with a long horizontal flourish extending to the right.

Don Sussman
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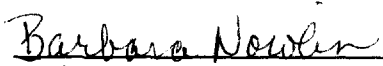
CERTIFICATE OF SERVICE

I, Barbara Nowlin, do hereby certify that copies of the foregoing Comments were sent via first class mail, postage paid, to the following on this 25th day of September, 1997.

Sheryl Todd (3 copies)**
Accounting and Audits Division
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